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Attorneys for Plaintiff
9 CHURCH OF SCIENTOLOGY INTERNATIONAL

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF MARIN

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|--------------------------------------|---|-----------------------------|
| 12 CHURCH OF SCIENTOLOGY |) | CASE NO. 157 680 |
| INTERNATIONAL, a California not- |) | |
| 13 for-profit religious corporation; |) | PLAINTIFF'S NOTICE OF |
| |) | MOTION AND MOTION FOR AN |
| 14 Plaintiff, |) | ORDER COMPELLING COMPLIANCE |
| |) | WITH COURT ORDER AND FOR |
| 15 vs. |) | SANCTIONS FROM MICHAEL AND |
| |) | SOLINA WALTON |
| 16 GERALD ARMSTRONG; MICHAEL WALTON; |) | |
| THE GERALD ARMSTRONG CORPORATION, |) | [C.C.P. § 2031(M)] |
| 17 a California for-profit |) | |
| corporation; Does 1 through 100, |) | DATE: April 6, 1995 |
| 18 inclusive, |) | TIME: 11:00 a.m. |
| |) | DEPT: DISCOVERY REFEREE |
| 19 Defendants. |) | William R. Benz |
| |) | |
| 20 _____ |) | TRIAL DATE: May 18, 1995 |

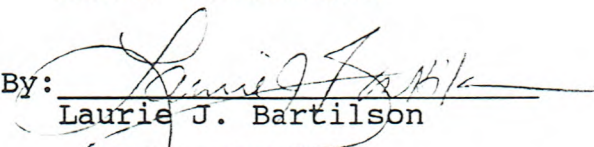
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22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
23 PLEASE TAKE NOTICE that on April 6, 1995, at 11:00 a.m., or
24 as soon thereafter as the matter may be heard, the law offices of
25 William R. Benz, Esq., located at 900 Larkspur Landing Circle,
26 No. 185, Larkspur, California, plaintiff CHURCH OF SCIENTOLOGY
27 INTERNATIONAL ("the Church") will and does hereby move, pursuant
28 to C.C.P. § 2031(m), for an order (1) requiring defendants

1 Michael and Solina Walton to comply with the Court's order of
2 December 16, 1994, granting plaintiff's motion to compel an
3 inspection of the premises, and (2) for monetary sanctions.
4 This motion is made on the grounds that, on December 16, 1994,
5 the Honorable Gary W. Thomas granted plaintiff's motion to
6 complete discovery concerning matters alleged in its fraudulent
7 conveyance Complaint which concern defendants Michael and Solina
8 Walton by having an appraiser inspect the real property which is
9 central to this dispute, and to depose Solina Walton. Although
10 Ms. Walton has appeared for deposition, she and her
11 husband/attorney/co-defendant, Michael Walton, have refused to
12 permit plaintiff to send an appraiser to complete the ordered
13 inspection. The Waltons have insisted that absent yet another
14 order from this Referee requiring the inspection, they will not
15 comply with Judge Thomas's order. Accordingly, plaintiff brings
16 this motion to compel compliance with the Court's order, and for
17 sanctions. This motion is based on this notice, and the
18 accompanying memorandum of points and authorities, and the
19 declaration of Laurie J. Bartilson.

20 Dated: March 20, 1995

Respectfully submitted,

21 MOXON & BARTILSON

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23 By: 
Laurie J. Bartilson

24 Andrew H. Wilson
25 WILSON, RYAN & CAMPILONGO

26 Attorneys for Plaintiff
27 CHURCH OF SCIENTOLOGY
28 INTERNATIONAL

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PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action. My business address is 115 Sansome Street, Suite 400, San Francisco, California.

On March 21, 1995, I caused the attached copy of PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR AN ORDER COMPELLING COMPLIANCE WITH COURT ORDER AND FOR SANCTIONS FROM MICHAEL AND SOLINA WALTON; MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF MOTION FOR AN ORDER COMPELLING COMPLIANCE WITH COURT ORDER AND FOR SANCTIONS FROM MICHAEL AND SOLINA WALTON; and DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR AN ORDER COMPELLING COMPLIANCE WITH COURT ORDER AND FOR SANCTIONS FROM MICHAEL AND SOLINA WALTON on the following in said cause, by placing for deposit with Lightning Express Messenger Service on this day in the ordinary course of business, true copies thereof enclosed in sealed envelopes. The envelopes were addressed as follows:

- | | |
|--|---|
| Gerald Armstrong 715 Sir Francis Drake Blvd. San Anselmo, California 94960 | William Benz 900 Larkspur Landing Circle, #185 Larkspur, CA |
| Michael Walton 700 Larkspur Landing Circle, #120 Larkspur, CA 94939 | |

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California on March 21, 1995.


COLLEEN Y. PALMER

WILSON, RYAN & CAMPILONGO
115 Sansome Street, Suite 400
San Francisco, California 94104